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April 15, 2025

REQUEST TO BE FILED UNDER SEAL

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

RE: United States v. Vladimir Antonio Arevalo-Chavez
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

We are writing in response to the Court's directive to make our positions clear on whether the documents and proceedings related to the government's motion to dismiss the indictment should be unsealed, as stated in the Court's Order of April 14, 2025.

We previously consented to having the communications with the Court be under seal as we conducted our own investigation and made an assessment of what rights of our client might be affected by the motion to dismiss.

At this time we note that the government's letter dated today does not really spell out what the "geopolitical and national security concerns" are that would apply to this case, or why any government staff would be endangered by the publication of the government's motion to dismiss and the response we intend to file.

At this time we see no compelling argument for maintaining these documents under seal, but in no way are we conceding our right to move to oppose the motion to dismiss, to oppose any such dismissal being without prejudice, or to

demand that our client's rights under the immigration laws and treaty obligations of the United States be afforded him so that he can contest any effort to remove him to a country where he likely faces persecution, torture, or even death at the hands of, or with the acquiescence of, the government of El Salvador.

Sincerely,

/s/ Louis M. Freeman
Louis M. Freeman

/s/ Thomas H. Nooter
Thomas H. Nooter
Attorneys for Defendant Averalo-Chavez

cc: John J. Durham, United States Attorney, by
Justina Geraci, Assistant United States Attorney
(By email)